

3/9/07-05166

Capito, Bonnie P CIV NAVFAC Lant

From: Nielsen, Janice L CIV NAVFAC MidLant
Sent: Wednesday, May 30, 2007 2:27 PM
To: Capito, Bonnie P CIV NAVFAC Lant
Subject: FW: Draft RI OU14 Site 90 - Comments from Navy

Attachments: Summary of Comments on Draft OU14 Site 90 Remedial Investigation.pdf



Summary of
Comments on Draft.

Navy comments for draft RI.

Jan Nielsen
NAVFAC Mid-Atlantic
Remedial Project Manager, Cherry Point
Marine Corps North Carolina IPT
(757) 322-8339

-----Original Message-----

From: Jackson, Rodger W CIV NAVFAC MIDLANT
Sent: Friday, March 09, 2007 14:42
To: ed.corack@ch2m.com
Subject: Draft RI OU14 Site 90 Comments from Navy

Rodger W. Jackson, P.E.
Environmental Business Line Team Leader NAVFAC Mid-Atlantic Marine Corps North Carolina
IPT
6506 Hampton Blvd.
Norfolk, Va. 23508-1278
Tel: (757) 322-4589 Fax: (757) 322-4530
Email: rodger.jackson@navy.mil

-----Original Message-----

From: Jackson, Rodger W CIV NAVFAC MIDLANT
Sent: Friday, March 09, 2007 14:38
To: 'Townsend.Gena@epamail.epa.gov'; GeorgeL100@aol.com; townsend.gena@epa.gov;
jeffrey.christopher@usmc.mil; george.lane@ncmail.net; william.friedmann@ch2m.com;
Kathryn.Tippin@ch2m.com; Acree, Melvin L CIV NAVFAC MIDLANT
Subject: RE: Draft RI OU14 Site 90 Comments

Team,

To me it looks like the storm water/indust sewer drains played a big role as a source, however the soil samples taken around the drains do not indicate that they are currently a source, but the GW contamination remains. I think the MNA process is occurring albeit slowly which may explain the longevity of the plume (we are seeing daughter products and some favorable conditions). Frankly, I don't know if we have enough LTM data (only 2 sample sets 3 yrs apart) to determine whether MNA has stalled or has accelerated! The GW velocity is very slow too. I will include this topic in the agenda. I believe Ed Corack will attend the meeting so we should be ready to discuss.

Attached is my comment summary. The pdf was too big to email, so I exported the comment summary. You can import them to your PDF.

Rodger W. Jackson, P.E.
Environmental Business Line Team Leader

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-----Original Message-----

From: Townsend.Gena@epamail.epa.gov
[mailto:Townsend.Gena@epamail.epa.gov]
Sent: Wednesday, February 14, 2007 16:13
To: GeorgeL100@aol.com; townsend.gena@epa.gov;
jeffrey.christopher@usmc.mil; Jackson, Rodger W CIV NAVFAC MIDLANT;
george.lane@ncmail.net; william.friedmann@ch2m.com;
Kathryn.Tippin@ch2m.com; Acree, Melvin L CIV NAVFAC MIDLANT
Subject: Draft RI OU14 Site 90 Comments

Hi all,

Attached are EPA's comments on the Draft RI for OU14 Site 90. We need to re look at the data with the plume maps, UST data, (including any information from the remedial systems along with future plans), and soil data. After a quick discussion with EPA's in house hydro person, it appears that there is not a lot of degradation (MNA) occurring. She thinks, by looking at the data, there may be some unidentified sources in this area that are still feeding the plumes. Another thought is, it could be that the MNA process is stalling by competing technologies that are being used by the UST program. I have no answers at this time, but, I do now we are not ready to move to a FS. We should put this on a meeting agenda when we all are prepared to technically brainstorm. I will bring EPA's hydro with me when we are prepared to discuss this with all pieces of the data. If we will not be ready for the next meeting I am willing to wait. It is better to take our time and make the best possible decision rather than push thru the process and realize at a later date that we chose the wrong technology.

(See attached file: Draft RI comments - EPA 2-2007.doc)

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Summary of Comments on Draft OU14 Site 90 Remedial Investigation

Page: 1

Author: rodger.jackson

Subject: Note

Date: 3/9/2007 14:27:51

 Re/EPA's 1st general comment. Instead of the single down-gradient soil sample being a potential source of the existing upgradient and side-gradient CVOC plume near 9009SB, I believe that potential sources seem to be the up-gradient storm water piping emanating out of Hangars 130 and 1701 (see Fig 2-2). Perhaps at one time solvents were released into the piping and via historical leaking, solvents escaped into the GW and traveled in the N.W. direction along the GW gradient at approx. 2ft/yr. The result is the 5-100ug/L Total CVOC plume in this area shown in Fig 5-4. Based off of soil samples near the storm drains at Bldgs 1701 and 130, and the low concentrations of CVOCs in this portion of the plume, it appears that the source is now gone and very low concentrations of CVOCs remain. Natural Attenuation does seem to be occurring since we are seeing VC and Cis-1,2 DCE as daughter products.

Author: rodger.jackson


Subject: Note


Date: 3/9/2007 12:13:42



Since the C-130 Washrack, Bldg 4075 and 1701 are pertinent to the RI and are potential sources to contamination, a description of the activities that occurred at these locations should be included in this section. In addition, a discussion should be included on the changes to the utility systems (e.g. historical leaking of Indus, storm, and fuel lines and the rerouting of industrial wastes and fuels to their respective IWTP and upgraded fuel lines) in this area since they may once have been potential sources for the CVOCs

Page: 74

Author: rodger.jackson
Subject: Note
Date: 3/9/2007 10:40:10
 Do you mean 9009SB?

Author: rodger.jackson
Subject: Note
Date: 3/9/2007 10:43:38
 This paragraph is confuding. What is Site? Do you mean Site 90 or Tank Farm A? Are you refering to 9009SB? From Fig 5.1, it doesn't seem that there is soil contamination in the northern portion of the Site 90.

Author: rodger.jackson

Subject: Note

Date: 3/9/2007 10:49:22



Identify specific non-chlorinated VOCs as was done in the previous sub-section, 'Chlorinated VOCs'.

Author: rodger.jackson

Subject: Note


Date: 3/9/2007 14:26:53

It also looks like another potential source is the up-gradient storm water piping emanating out of Hangars 130 and 1701 (see Fig 2-2). Perhaps at one time solvents were released into the piping and via historical leaking, solvents escaped into the GW and traveled in the N.W. direction along the GW gradient at approx 2ft/yr. The result is the 5-100ug/L Total CVOC plume in this area shown in Fig 5-4. Based off of soil samples near the storm drains at Bldgs 1701 and 130, and the low concentrations of CVOCs in this portion of the plume, it appears that the source is now gone and very low concentrations of CVOCs remain.

Author: rodger.jackson

Subject: Note


Date: 3/9/2007 12:51:26

 Even though the Non CVOCs may be UST related, I think a more detailed discussion of the nature and extent similar to the CVOC discussion may be needed here. Especially if we need to explain in it in detail to support a ROD.

Author: rodger.jackson

Subject: Note

Date: 3/9/2007 13:16:43

 If you look at Fig 2-2, you will see that a storm water pipe is within the same foot print of the highest contaminated area of this southern plume. Again, I suspect the source may be historic leaking from storm water pipes emanating from the C-130 Washrack, C-130, and 1701. One in the GW, the contamination follows the GW gradient (2ft/yr). The result is the >200ug/L Total CVOC plume in this area shown in Fig 5-8.


Author: rodger.jackson


Subject: Note

Date: 3/9/2007 13:00:59



This is a trihalomethane. The hit within the Yorktown seems odd. Could it be related to drinking water pipe leakage or contamination from our drilling activities? There is a drinking water line nearby.


Author: rodger.jackson
Subject: Note
Date: 3/9/2007 13:23:05
 add "near Bldg 4495"

Author: rodger.jackson
Subject: Note
Date: 3/9/2007 13:25:13
 no industrial/sewer/storm pipes near this soil boring. there is a water pipe.


Author: rodger.jackson


Subject: Note

Date: 3/9/2007 14:04:40

 This seems to contradict the recommendations made at the end of this section as well as the recommendation made in Section 9. If there is no indication of a need to mitigate for current industrial workers because the levels are below OSHA, why would we need to sample for a future industrial scenario? The residential scenario is another story and the team needs to make that decision. When we make this decision, we need to consider anticipated future land use for the site and whether or not we want to clean up to UU/UE.

Author: rodger.jackson
Subject: Cross-Out
Date: 3/9/2007 13:49:03

 Change to 'Soil'. If we do need to do additional sampling, the team will need to consider the merits of near-slab vs sub-slab sampling as well as the suitability of outdoor air sampling in this location. I recommend striking this out of the report, because we will make this management decision as we exit this RI.

Author: rodger.jackson
Subject: Note
Date: 3/9/2007 13:55:07
 "subsurface"


Author: rodger.jackson
Subject: Cross-Out
Date: 3/9/2007 13:53:36



Author: rodger.jackson

Subject: Note

Date: 3/9/2007 14:06:49

 This seems to contradict the recommendations made at the end of Section 7.6.3 (See comment there).
